

Department of Energy

Berkeley Site Office Lawrence Berkeley National Laboratory 1 Cyclotron Road, MS 90-1023 Berkeley, California 94720

Mr. Keith Takata U.S. Environmental Protection Agency 75 Hawthorne Street San Francisco, CA 94105

Subject: Risk Assessment of Environmental Tritium at Lawrence Berkeley National Laboratory

(LBNL)

Dear Mr. Takata:

Attached is the Risk Assessment of Environmental Tritium at Lawrence Berkeley National Laboratory, dated November 19, 2001. This report was prepared in accordance with EPA's Superfund Guidance for preparing baseline risk assessments. For your information, we have also attached the LBNL cover letter submitting the report to us. We agree with the Lab that the Risk Assessment corroborates all of the prior tritium data collected and conclusively confirms that the tritium emissions from the LBNL National Tritium Labeling Facility (NTLF) pose no significant threat to human health or the environment.

We also share LBNL's conclusion that no valid purpose would be served by placing the site on the National Priorities List (NPL) since, among other reasons, no clean-up would be required under the Superfund program, because the site already meets the clean-up goals likely to be applied to the NTLF.

We request a formal determination that you do not propose to put LBNL on the NPL. The attached Risk Assessment strongly supports such a determination. In addition, we again request that you reverse your earlier Superfund eligibility determination for LBNL, because we believe that the active permitted air emissions should not be included in the HRS score, and that any tritium air emissions that are included should be averaged over time. We discussed these reasons with you in our meeting on July 11, 2001. As you may know, the NTLF will discontinue operations in December, which will further reduce the already low tritium emissions at LBNL.

We appreciate your prompt attention to this matter. If you have any questions, please contact Carl Schwab at 510-486-4298.

Sincerely,

Richard H. Nolan, Director Berkeley Site Office

Enclosure:

- 1) Risk Assessment of Environmental Tritium at Lawrence Berkeley National Laboratory, dated November 19, 2001
- 2) LBNL letter to DOE, dated November 20, 2001

cc w/enclosure:

- P. Armstrong, EPA
- M. Bandrowski, EPA
- P. Wood, EPA
- B. Curnow, EPA
- J. Griggs, EPA/NAREL
- C. Schwab, OAK/BSO

David McGraw, LBNL (w/o enclosures)

bc w/o enclosure:

N. Shepard, LBNL

Ron Pauer, LBNL

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- H. Carwell, OAK/BSO
- J. Cullen, OAK/EM
- H. Patel, OAK/EM (w/ enclosures)
- J. Cummins, OAK/GLD
- J. Parenti, OAK/GLD (w/ enclosures)